

January 30, 2006

Office of the Comptroller of the Currency  
250 E Street, S.W.  
Public Reference Room, Mail Stop 1-5  
Washington, DC 20219  
Attn: Docket No. 05-21  
regs.comments@occ.treas.gov

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552  
Attn: Docket No. 2005-56  
regs.comments@ots.treas.gov

Robert E. Feldman  
Executive Secretary  
Attn: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17th Street, NW  
Washington, DC 20429  
comments@fdic.gov

Jennifer Johnson  
Secretary  
Board of Governors of the Federal Reserve  
System  
20th Street and Constitution Avenue, NW  
Washington, DC 20551  
Attn: Docket No. OP-1246  
regs.comments@federalreserve.gov

Re: Proposed Guidance-Interagency Guidance on Nontraditional Mortgage  
Products 70 FR 77249 (December 29, 2005)

Dear Sir or Madam:

The Housing Policy Council of The Financial Services Roundtable respectfully requests that you extend the comment deadline on the proposed Guidance on Nontraditional Mortgage Products for, at least, an additional 30 days.

The Housing Policy Council consists of twenty-two national mortgage lending firms, and we plan to file comments on the Guidance. Yet, as we have started to analyze the Guidance, it is evident that we will need additional time to prepare our comment letter.

The Guidance is broad in scope and detailed in nature. It addresses all aspects of nontraditional mortgage lending practices, including loan underwriting practices, portfolio and risk management practices, and consumer protection practices. We have asked our member companies to provide us with information on existing practices in these areas, and to compare those practices with the terms of the Guidance. Gathering such information requires input from multiple business groups including credit risk, data processing, and consumer compliance. Also, we note that the Guidance was released at the end of last year, just as our member companies were facing other reporting deadlines.

Given the scope and detail of the Guidance, and its potential impact on our membership and consumers, we urge you to grant this request.

Sincerely,

John H. Dalton  
President